

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION

STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI, ATTORNEY)
GENERAL and REPORTER, and)
COMMONWEALTH OF KENTUCKY, ex)
rel. DANIEL CAMERON, ATTORNEY) 3:23-CV-00046-DCLC-JEM
GENERAL,)
)
Plaintiffs,)
)
v.)
)
IDEAL HORIZON BENEFITS, LLC d/b/a)
SOLAR TITAN USA, et al.,)
)
Defendants.)

DECLARATION OF RICHARD ATNIP

Richard Atnip declares as follows:

1. I am over 18 years old and have personal knowledge of the matters contained in this declaration.
2. I own a 90% interest in Ideal Horizon Benefits, LLC (the "Company").
3. I was not involved in the day to day activities of the Company after the first year of its inception.
4. Since I was not involved in day to day activities, I relied on financial documents provided to me to understand the financial condition of the Company.
5. I was unaware of any financial distress to the Company until July, 2022.
6. When I became aware, I started investing my personal money back into the Company.
7. I invested at least the following payments back into the Company:
 - A. \$500,000 on July 5, 2022;
 - B. \$72,979.65 on July 7, 2022;
 - C. \$500,000 on July 11, 2022;
 - D. \$100,000 on July 20, 2022;
 - E. \$400,000 on August 25, 2022;

- F. \$129,475 on August 29, 2022;
- G. \$175,000 on September 6, 2022;
- H. \$330,000 on September 8, 2022;
- I. \$250,000 on September 12, 2022;
- J. \$250,000 on September 29, 2022;
- K. \$70,000 on October 7, 2022;
- L. \$85,000 on October 13, 2022;
- M. \$10,000 on October 20, 2022;
- N. \$120,000 on October 24, 2022; and
- O. \$162,000 on November 17, 2022.
8. I invested at least a total of \$3,154,454.65 since July of 2022.
9. I never purchased a private jet, or plane of any type. I do have miles on a private jet card.
10. I did not purchase a yacht for \$1,800,000. I purchased a charter fishing boat for \$1,400,000.
11. I was forced to sell my charter fishing boat for a loss to invest the proceeds back into the Company.
12. In April, 2022, I did purchase real property at 3411 Tooles Bend Rd Knoxville Tn 37922 for approximately \$8,750,000.
13. I sold this property as soon as I heard of the financial distress of the Company.
14. All of my real property is based in Tennessee, except for one investment property that is under contract for sale in Florida.
15. I have no foreign assets or bank accounts of any kind.
16. I declare under penalty of perjury that the statements above are true and correct to the best of my knowledge, information, and belief.


Richard Atnip

Feb 13th 2023
Date

(4499-00001 Declaration of Richard Atnip.1)